

Davidson Interior Trim **TEXTRON**

Davidson Interior Trim/
Subsidiary of Textron Inc.

RECEIVED SEP 13 1988

Industrial Park
Dover, NH 03820
603/742-0720



SDMS DocID 559375

September 12, 1988

Mr. Paul Marchessault
U.S. Environmental Protection Agency
P. O. Box 3409
Reston, VA 22091

Superfund Records Center
SITE: Coakley
BREAK: 119
OTHER: 559375

RE: Coakley Landfill
North Hampton, New Hampshire
Request For Information

Dear Mr. Marchessault:

Attached are the responses of Davidson Interior Trim Textron ("Davidson") to the U.S. EPA's Request For Information concerning the Coakley Landfill in North Hampton, New Hampshire. These responses are submitted to the best of the undersigned's knowledge and belief.

If additional or conflicting information should become available, Davidson will supplement these responses. In turn, should the EPA have in its possession any documents which indicate that Davidson is connected to the Coakley Landfill, please forward this information to my attention as soon as possible. You may consider this a formal request under the Freedom of Information Act. I will follow up in 20 days if I do not hear from you before then.

Sincerely,

Randall Lund
Environmental Coordinator

RL/jc

cc: Andrew Carl Spacone

COAKLEY LANDFILL

FIRST INFORMATION REQUEST

GENERAL INFORMATION

1. Identify the person(s) answering these Requests on behalf of the Respondent.

Randall Lund - Environmental Coordinator, Davidson Interior Trim/Textron

2. For each and every Request contained herein, identify all persons consulted in the preparation of the answer.

Howard Williams, Roger LePage and Robert Hynes.
The above individuals are currently employed by:

Davidson Interior Trim/Textron
Industrial Park
Dover, NH 03820

Leonard Rosen - Rosen Trucking
136 Mount Vernon
Dover, NH 03820

3. For each and every Request contained herein, identify all documents consulted, examined or referred to in the preparation of the answer and provide true and accurate copies of all such documents.

Shipping and financial records, to the extent that these records have not been destroyed according to the Company's normal record retention procedures, were reviewed. Because a review of these documents did not indicate that Davidson Interior Trim used the Coakley Landfill, copies of such documents have not been included.

4. If you have a reason to believe that there may be persons able to provide a more detailed or complete response to any Request contained herein or who may be able to provide additional responsive documents, identify such persons and the additional information or documents that they may have.

Mr. Raymond Bardwell
New Durham, NH

Based on an interview with Leonard Rosen, identified above, Mr. Bardwell may have information concerning cafeteria trash that Davidson may have had disposed of at the Coakley Landfill for a limited period of time in 1980 or 1981. This material would not have been hazardous.

5. Identify all persons, including Respondent's employees, who have knowledge or information about the generation, use, purchase, treatment, storage, disposal or other handling of materials at, or transportation of materials to the Site.

Leonard Rosen, identified above.

6. For each and every Request contained herein, if information responsive to the Information Request is not in your possession, custody or control, then identify the persons from whom such information may be obtained.

Subject to Davidson's response to Request #4, Davidson is not, at this time, able to identify other persons with relevant information concerning this matter.

7. If you have answered any of these requests in a previous Information Request letter, please specify the date of the letter and the request to which you have responded relevant to Coakley Landfill.

To the best of my knowledge, Davidson has not received a previous information request concerning the Coakley Landfill.

FINANCIAL/CORPORATE INFORMATION

8. Please state the correct legal name of your town, company, agency or business. For towns, provide the name and address of the current primary officer or town manager of you town. For companies, provide the name and address of the current president and chairman of the board of directors of your company. Additionally, please state any other names by which your company has been known.

Davidson Interior Trim
Industrial Park
Dover, New Hampshire 03820
Richard J. Ferrari, President

Prior to February, 1987, Davidson Interior Trim operated under the name Davidson Rubber Company Incorporated.

9. If the company is or was a subsidiary of another corporation, identify such other corporation and state the dates during which the parent/subsidiary relationship existed and the name and address of the corporation president and chairman of the board and other officers.

Presently Davidson Interior Trim is a division of Textron Inc.

Textron Inc.
40 Westminster Street
Providence, Rhode Island 02903
Beverly F. Dolan, President
Chairman and Chief Executive Officer

Davidson Rubber Company operated as a subsidiary of the McCord Corporation between 1964 and 1978. In 1978, Ex-Cell-O Corporation acquired McCord and, thus, Davidson became a subsidiary of Ex-Cell-O. In September 1986, Textron acquired the Ex-Cell-O Corporation.

10. Identify the state of incorporation and the agent for service of process for all companies identified in response to Requests 8 and 9 above. For towns, include all notice and/or service of process requirements.

Textron is incorporated in the State of Delaware. Textron's agent for service is CT Corporation.

11. Please state the nature of Respondent's business and briefly describe its operation.

Davidson Interior Trim/Textron develops, manufactures and markets high technology arm rests, head rests, door panels and consoles as original equipment to North American car and light truck producers. The manufacturing process requires three basic components: plastisol shells, fiberboard or metal inserts and foam.

12. Identify all liability insurance policies held by Respondent from 1960 to the present. In identifying such policies, state the name and address of each insurer and of the insured, the amount of coverage under each policy, the commencement and expiration dates for each policy, whether or not the policy contains a "pollution exclusion" clause, and whether the policy covers or excludes sudden, non-sudden or both types of accidents.

Davidson objects to this Request because of the overly burdensome and time-consuming effort which would be required to prepare a response. Such a response would result in the production of much irrelevant information because Davidson is certain that it did not use this site for such an extensive time period. Should the EPA or other parties provide Davidson with information that indicates Davidson arranged for the disposal of hazardous waste at the Coakley Landfill, and the dates of this disposal, Davidson will provide information on the insurance policies in effect during this time period and on other policies that provide coverage. Notwithstanding the above, Davidson states that it had insurance coverage during the above period, and whether said coverage is applicable to environmental matters such as the Coakley Landfill, is the current subject of litigation which the company is a party.

13. Identify Respondent's current assets and liabilities and current net worth.

See Textron's Annual Report for 1987, a copy of which is enclosed.

GENERATOR/TRANSPORTER INFORMATION

14. Have you or any person working with you or on your behalf ever accepted materials (hazardous and non-hazardous) for transportation to the Site from any person? If the answer to this question is anything but an unequivocal no, identify:

Davidson assumes that this request for information applies to transporters only. Because Davidson is not a transporter for purposes of this subject site, the answer, therefore, is not applicable. If Davidson is incorrect in its interpretation of this request for information, please so advise.

15. Have you arranged for disposal or treatment, or transportation for disposal or treatment, of hazardous materials to the Site? If the answer to this question is anything but an unequivocal no, identify:

To the best of Davidson's knowledge, Davidson has not arranged for disposal or treatment, or transportation for disposal, or treatment of hazardous waste to the site.

CE[®]

Claim Check
No. **345886**

☐ Hold

Date **9-13**

1ST Notice

2ND Notice

Return

Detached from
PS Form 3849-A,
Oct. 1985

2-POUND PAK[™]

PRESS HARD
YOU ARE MAKING 4 COPIES

FROM:

Mr. R. W. Lund
Davidson Interior Trim/Textron
Industrial Park PO Box 1504
Dover, NH 03820-1504

Customer Number if any

TO:

Mr. Paul Marchessault
P.O. Box 3405
Reston, VA 22091

U.S.G.P.O. 1984-425-341 Label 11B (1-84)

EXPRESS MAIL

**POST OFFICE
TO ADDRESSEE**



ORIGIN:

Initials of Receiving Clerk **[Signature]**

P.O. ZIP Code **03820**

Date in **9/13** Time in **11:00**

Return Receipt Service (Additional fee required)
☐ To Whom & Date Del
☐ To Whom Date & Address of Del

Weight **2.5** Lbs.

Postage & Fees \$ **1.10**

B 80569151

DESTINATION:

Date of Del **9/13/88** Time of Del **1:00**

Initials of Del Emp **[Signature]**

Signature of Addressee or Agent **[Signature]**

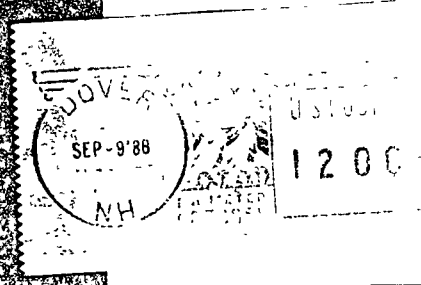
DELIVERY WAS ATTEMPTED

Date **9-13-88** Time **12:10**

Notice Left By **[Signature]**

EXPRESS MAIL SERVICE

TO REMOVE PEEL BACK HERE



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Davidson Interior Trim

TEXTRON

Davidson Interior Trim/
Subsidiary of Textron Inc.
Industrial Park
Dover, NH 03820

MR. PAUL MARCHESSAULT
U.S. ENVIRONMENTAL PROTECTION AGENCY
P. O. BOX 3409
RESTON, VA 22091

First Class Mail